

Arbitration Matter between:

John Grabowski, et al.,

Class Claimants,

v.

Wackenhut Services, LLC,

Respondent.

JAMS Reference Number: 090806B

SCHEDULING ORDER NO. 13

A hearing was conducted in this matter by telephone conference call on March 25, 2008, at 10:00 a.m. Eastern Daylight Time.

Participating in the conference by telephone were:

- a. The Arbitrator
- b. Claimant's counsel, Janet Wise, Esquire and Cynthia N. Sass, Esquire
- c. Respondent's counsel: Nancy Heermans, Esquire and Henry Morris, Esquire

Also present with Claimant's counsel was a court reporter who recorded the telephone conference on the same terms as set forth in prior Scheduling Orders.

During this telephone conference the parties requested an extension to complete discovery in Phase I of this matter.

The following order is made respecting the conduct of this arbitration:

- i. This arbitration will be bifurcated into a liability stage and a damages stage, with no discovery to be conducted during the liability phase that relates strictly to the issue of damages.
2. This Scheduling Order relates solely to discovery during the liability stage of this arbitration. With agreement of counsel, a deadline for the end of "Phase 1" of fact discovery has been extended to September 8, 2008, as set forth below. On September 18, 2008, counsel will report back to the arbitrator at a conference call to discuss whether either party wishes to request additional depositions and, if so, the reasons for those requests and the identity and numbers of any such requested depositions. If counsel report that neither side requests further fact discovery including depositions, the arbitrator will declare fact discovery closed. If either side requests additional depositions along with documents necessitated by same,

the arbitrator will rule on such requests and a date for the "End of Fact Discovery" will be set.

3. With respect to depositions, during the Phase 1 of fact discovery, which will end on September 8, 2008:
 - (a) Claimants may take the depositions of up to 8 Wackenhut representatives;
 - (b) Claimants have identified 6 Class Representatives who will testify at the hearing and Respondent may take the depositions of those individuals;
 - (c) In addition to the individuals identified in Paragraph 3(b) above, Respondent may take the depositions of Scot Rose, Art Sobota and/or Michael Brent Parker;
 - (d) In addition to the individuals identified in Paragraphs 3(b) and 3(c) above, Respondent may take the depositions of 12 additional class members who may or may not be among the Class Representatives. It is understood that the need for Respondent to take the depositions of these class members is to develop a factual record of the conditions under which the class members worked at the different bases. Counsel for both sides will continue to work cooperatively to identify the locations for taking depositions in light of the needs of deponents and counsel.
 - (e) There are limitations of time set on the depositions. For the depositions of the corporate representatives the Claimants will take, there is 2-day/14-hour limitation of time. For all other depositions taken by the Claimants or by Respondent, there is a 1-day/7-hour limitation of time.

4. By agreement of counsel and with the concurrence of the Arbitrator, the following is the schedule for Phase 1 (the liability stage) of this arbitration:

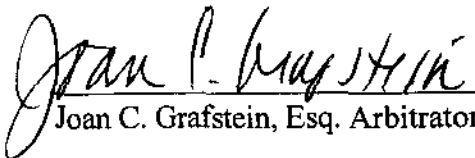
Voluntary Exchange of Information (JAMS Rule 17(a))	January 15, 2008
End of Phase I of Fact Discovery	September 8, 2008
Conference Call with Arbitrator	September 18, 2008 at 10:00 a.m.
Arbitrator's ruling on whether to permit additional Depositions along with documents pertaining to persons to be deposed and possible additional document discovery necessitated by additional depositions.	TO BE DETERMINED
End of Fact Discovery for liability phase.	TO BE DETERMINED

Date to be set depending on the Arbitrator's Ruling on possible additional depositions.

Claimants' Expert Report(s) (if any)	30 days from End of Fact Discovery
Respondent's Expert Report(s) (if any)	30 days from deadline for Claimant's Expert Report
End of Expert Discovery	2 weeks from deadline for Respondent's Expert Report
Dispositive Motions filed (if any)	30 days from End of Expert Discovery
Oppositions to Dispositive Motions	2 weeks from deadline for filing Dispositive Motions
Reply Brief re Dispositive Motions	2 weeks from deadline for Oppositions to Dispositive Motions
Hearing on Dispositive Motions	Approximately 10 days from deadline for Reply Briefs re Dispositive Motions
Pre-Hearing Submissions (JAMS Rule 20)	90 days from Hearing on Dispositive Motions
Hearing on Liability	Beginning approximately 30 days from Pre-Hearing Submissions and currently estimated to last at least one full week

4. A conference call with the arbitrator has been set for April 22, 2008 at 10:00 a.m. to discuss the status of this arbitration.

So ordered this 20th day of April, 2008


Joan C. Grafstein, Esq. Arbitrator

IN ARBITRATION

John Grabowski)
)
 Claimant,)
)
 v.) Commencement Date: November 08,
) 2006 Before JAMS,
) Reference No. 090806B
 Wackenhut Services, LLC)
)
 Respondent.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Scheduling Order No. 13 has furnished this 9th day of April, 2008, by United States mail upon the following:

Janet Wise, Esq.
Cynthia N. Sass, Esq.
Law Office of Cynthia N. Sass, P.A.
601 West Dr. Martin Luther King, Jr. Blvd.
Tampa, FL 33603

Nancy Heermans, Esq.
Henry Morris, Jr., Esq.
Arent Fox, PLLC
1050 Connecticut Avenue, NW
Washington, DC 20036-5339

By: Katrice D. Richards
Katrice D Richards
JAMS Atlanta Office
Suite 640
1100 Peachtree Street NE
Atlanta, GA 30309
Telephone: (404) 974-9829